

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC, *et al.*,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, *et al.*,

Plaintiff,

vs.

FRANCES FERNANDEZ,

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding
Case No. 19-50816 (BLS)

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

Plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust (the "Plaintiff") by and through its undersigned counsel, hereby requests that a default be entered against the defendant Frances Fernandez ("Defendant"), in the above-captioned adversary proceeding based on the details of the *Affidavit of Counsel in Support of Plaintiff's Request for Entry of Default* (the "Affidavit") filed concurrently herewith, and the *Complaint for Avoidance and Recovery of Preferential and Fraudulent Transfers Pursuant to 11 U.S.C. Sections 544, 547, 548, & 550* with accompanying *Summons* and *Certificate of Service*, attached to the Affidavit as Exhibit 1. A form of *Entry of Default* is attached hereto as Exhibit A.

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Dated: July 2, 2020

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142)
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*Counsel to Plaintiff Michael Goldberg, in his
capacity as Liquidating Trustee of the Woodbridge
Liquidation Trust*